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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

OWEN DIAZ
Plaintiffs,
v.
TESLA, INC. DBA TESLA MOTORS, INC.,
Defendants.

Case No. 3:17-cv-06748-WHO

**DEFENDANT TESLA, INC.'S
OBJECTION TO PROPOSED VERDICT
FORM**

Trial Date: September 24, 2021
Compliant Filed: October 16, 2017

RE PROPOSED VERDICT FORM (DKT. NO. 279):

Defendant, Tesla, Inc. respectfully requests that Question 4 on the Proposed Verdict Form be accompanied by instructions: "*If you answered "No" to questions 3 and 4, skip question 5 and go to question 6.*" If the jury finds that Defendant did not prove all the elements of hostile work environment caused by supervisor, hostile work environment caused by a non-immediate supervisor or co-worker, or liability based on civil rights violation in a contractual relationship, then there can be no failure to prevent harassment claim.

Dated: October 2, 2021

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____

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